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11 Attorneys for Plaintiff  
12 United States of America

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14 IN THE UNITED STATES DISTRICT COURT  
15 EASTERN DISTRICT OF CALIFORNIA

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17 UNITED STATES OF AMERICA, Plaintiff,  
18 v.  
19 JESUS RAMON CAMPOS, Defendant.

20 CASE NO. 2:22-CR-00010-WBS  
21 STIPULATION REGARDING EXCLUDABLE  
22 TIME PERIODS UNDER SPEEDY TRIAL ACT;  
23 FINDINGS AND ORDER  
24 DATE: February 21, 2023  
25 TIME: 9:00 a.m.  
26 COURT: Hon. William B. Shubb

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28 **STIPULATION**

29 Plaintiff United States of America, by and through its counsel of record, and defendant, by and  
30 through defendant's counsel of record, hereby stipulate as follows:

31 1. By previous order, this matter was set for status on February 21, 2023.  
32 2. By this stipulation, defendant now moves to continue the status conference until March  
33 20, 2023 at 9:00 a.m., and to exclude time between February 21, 2023, and March 20, 2023, under  
34 Local Code T4.

35 3. The parties agree and stipulate, and request that the Court find the following:

36 a) The government has represented that the discovery associated with this case  
37 includes Spanish audio recordings, reports, and photographs. This discovery has been either  
38 produced directly to counsel and/or made available for inspection and copying.

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b) Counsel for defendant needs additional time to review the discovery, meet with her client to discuss the discovery and the evidence impacts resolution and sentencing options, conduct independent factual investigation, and otherwise prepare for trial.

c) Counsel for defendant believes that failure to grant the above-requested continuance would deny him/her the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

d) The government does not object to the continuance.

e) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of February 21, 2023 to March 20, 2023, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

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1       4. Nothing in this stipulation and order shall preclude a finding that other provisions of the  
2 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial  
3 must commence.

4       IT IS SO STIPULATED.

5       Dated: February 15, 2023

PHILLIP A. TALBERT  
United States Attorney

7       /s/ CAMERON L. DESMOND  
8       CAMERON L. DESMOND  
9       Assistant United States Attorney

10      Dated: February 15, 2023

11       /s/ Megan McLoughlin  
12       Megan McLoughlin  
13       Counsel for Defendant  
14       Jesus Ramon Campos

15       **FINDINGS AND ORDER**

16       IT IS SO FOUND AND ORDERED.

17      Dated: February 16, 2023

18       William B. Shubb  
19       WILLIAM B. SHUBB  
20       UNITED STATES DISTRICT JUDGE